Eastern Agency / State of NM

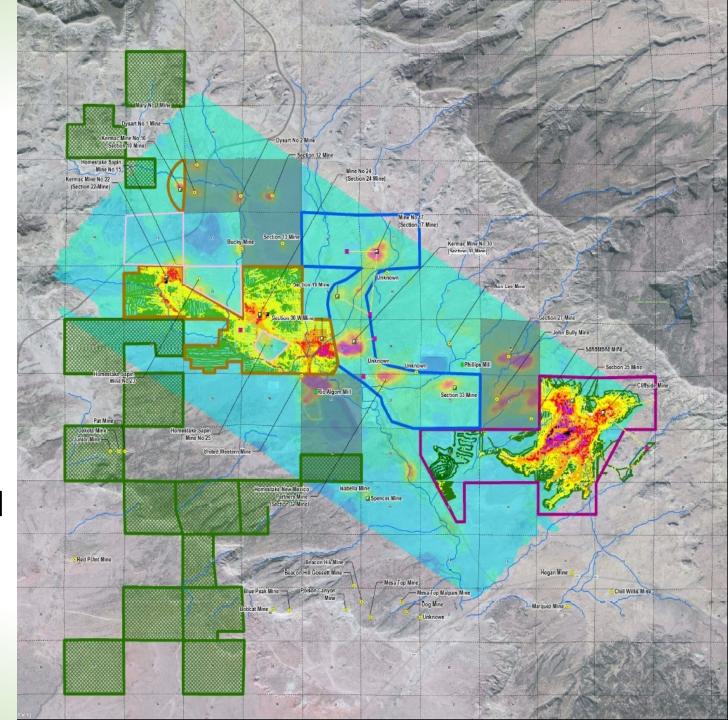


TRONOX MINE SITES Ambrosia Lake Sub-District

Surface and Near Surface Radiological Assessment

Background / Status

- 12 U mine surface expressions in the Ambrosia Lake SD of the Tronox settlement area
 - 8 EPA 6 lead
 - 3 EPA 6 and 9 co-lead (Section 10, Section 22 and Section 32/33)
 - 1 BLM lead (no funding request anticipated)
- Ambrosia Lake SD Mine Removal Assessment Areas
 - Section 32/33
 - 3 Geographic Sub-Areas

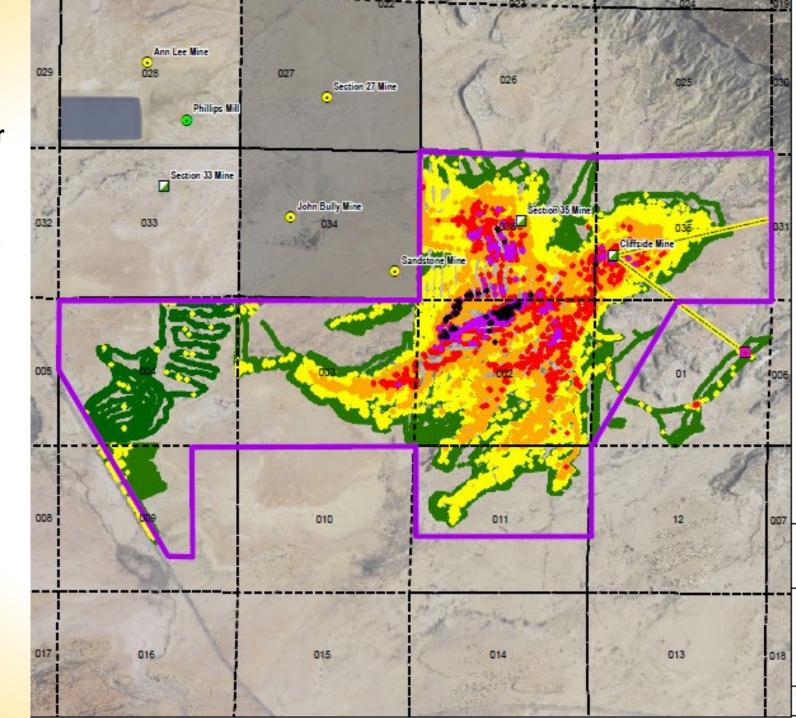


Key Accomplishments

- ✓ EE/CA Approval Memorandum for East GSA signed and EE/CA preparation initiated
- ✓ RSA in West GSA on-going and on schedule
- ✓ Continued developing joint EPA 6 and EPA 9 Community Involvement Plan for Tronox Settlement Area
- ✓ Continued integrating Navajo Fundamental Law into CERCLA process where possible
- ✓ Monthly calls, quarterly meetings with Tronox Team

EAST GSA STATUS

- Extent of contamination assessment or RSA completed 03/16.
- EE/CA Approval Memo signed 04/16.
 - Documents threats posed by Site from RSA
 - Authorizes preparation of EE/CA
- EE/CA document in preparation, initial draft due 08/16:
 - Evaluates feasible remediation options to protect human health and environment.
 - Cost analysis of remediation options including costs for removal, waste management, cultural resource impacts, revegetation and long-term management
- Continuing Community Involvement Plan (CIP) development in conjunction with R9.



EAST GSA PLANNED 2016 ACTIVITIES

ALL PLANNED
2016 ACTIVITIES
IN GSA WILL
UTILIZE EXISTING
2015 FUNDING



EE/CA
Review/
Comment
Period (Tronox
Team)
CY16/Q3

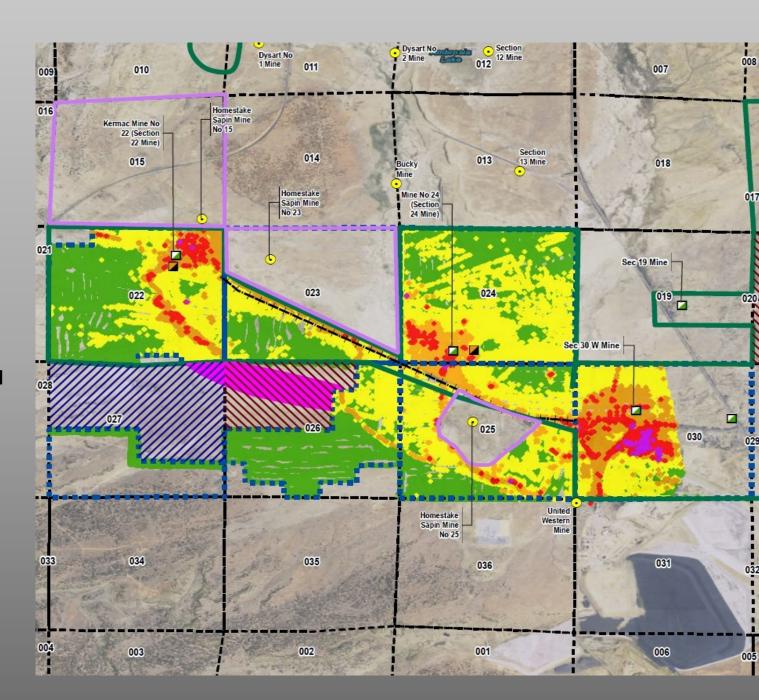
Finalize CIP CY16/Q3

EE/CA Public Comment Period & Response to Comments CY16/Q4

Draft Non-Time Critical Action Memorandum CY16/Q4

WEST GSA STATUS

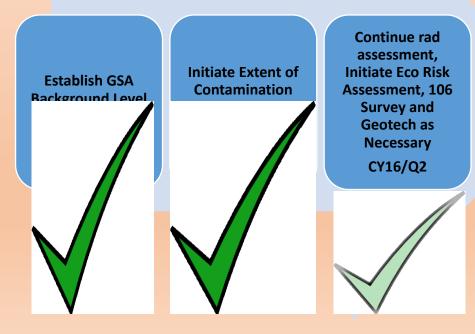
- Initiated RSA on 03/14/2016, Ongoing and on-schedule
- **❖** Issues
 - ☐ Have <u>3 non-Tronox</u> mines impacting Tronox NAUM area
 - Mines were assessed using R6 AOA funds
 - R6 will seek enforcement action against mine operators under CERCLA for "noninterference"
 - ☐ BLM property potentially impacted from Tronox Section 22 off-site migration
 - R6 seeking access from BLM to assess and determine if waste originated from Tronox Section 22
 - Navajo allotment land potentially impacted from Section 22 off-site migration
 - R6/R9 contacted BIA (Eastern Agency) to identify allotees
 - R6 working with Priscilla Tom to establish "active" status of homesite or grazing permits on allotments
 - R6 will coordinate any assessment activities on allotments with Navajo EPA



WEST GSA 2016 PLANNED ACTIVITIES

EXTENT OF CONTAMINATION SURVEY

EE/CA PROCESS



Finalize Extent of Contamination and Interim Status Report CY16/Q3

EE/CA Approval Memo Signed CY16/Q3

Prepare EE/CA CY16/Q3 Complete EE/CA CY16/Q4 Review/
Comment
Period
(Tronox
Team)
CY16/Q4

EE/CA

Finalize CIP CY16/Q4 Public Comment Period & Response to Comments

EE/CA

Region 6 Ambrosia Lake Sub District Activities and Navajo Fundamental Law

Where possible and to the extent practicable, the principles of Navajo Fundamental Law are integrated into all R6 CERCLA activities in Ambrosia Lake

- Cultural resources surveys conducted or planned, consistent with Traditional Law and CERCLA requirements
- Biological resource surveys conducted or planned, consistent with Natural Law and CERCLA requirements
- Community/Chapter meetings and Outreach Activities consistent with Traditional, Customary and Common Laws and CERCLA requirements
 - Presented overview of R6 ALSD activities at Baca-Prewitt Chapter meeting
 - Began residential outreach along Black Wood Road area in Baca-Prewitt Chapter
 - Working on joint outreach opportunities with Priscilla Tom at the Eastern Agency Fair
- Working through established process to obtained access from and provide information to the allotees with interest in allotments impacted by mine discharge (Section 27) consistent with Customary and Common Law and CERCLA requirements.

Navajo Workforce Development Highlights

- Will seek bids from qualified Navajo owned firms to conduct cultural resource survey on Section 27 allotment land in West GSA
- Will seek bids from qualified Navajo owned firms to conduct ecological survey on Section 27 allotment land in West GSA
- Continuing with on-going research and contacting Navajo owned providers for Site related services that are willing to travel to the Ambrosia Lake Sub-District area

